



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 21, 2019

BY ECF

MEMO ENDORSED

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The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
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DATE FILED: 11/22/19

Re: *United States v. Richard Gaffey and Harald Joachim von der Goltz*, 18 Cr. 693 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter regarding scheduling in this case. On November 19, 2019, a grand jury returned a superseding indictment against the defendants, including one new count against defendant Richard Gaffey. The Government and the defense have met and conferred regarding scheduling an arraignment on the charges in the superseding indictment. To accommodate the scheduling needs of the parties and defense counsel, the parties jointly request that the Court schedule the arraignment for January 6, 2020 at 11:00 a.m., during the pretrial conference that is already scheduled in this case.

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Because the purpose of this proposed schedule is to accommodate the schedules of the defendants and counsel, the parties jointly submit that the ends of justice served by the proposed schedule outweigh the best interests of the public and the defendant in a speedy trial, and request that the Court accordingly exclude time under 18 U.S.C. 3161(h)(7)(A) and (B), from November 21, 2019, until January 6, 2020. The Government has met and conferred with defense counsel, who consents to these requests.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

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Trial Attorneys, Criminal Division

cc: Defense Counsel (by ECF)

Application granted. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.	
SO ORDERED Date: <u>11/22/19</u>	<u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.